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March 12, 2020

VIA ECF & FAX

Hon. Alvin K, Hellerstein United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

2 16. Yellari

CenturyLink Telecommunications, LLC v. Triumph Construction Corp.,

19 Civ. 6191 (AKH) (S.D.N.Y.)

Dear Judge Hellerstein:

The parties to the above-referenced action (the "Action") jointly submit this letter, and respectfully request that this Court briefly extend the schedule for any dispositive motions.

By way of background, the parties appeared at a status conference in this action on January 10, 2020, during which the Court set a schedule for depositions and dispositive motions. The parties have worked cooperatively to complete depositions, but need additional time to complete discovery due to witness and counsel availability.

Based on the foregoing, the parties have agreed to the following, and submit the same to this Court for approval:

- The parties shall have until April 17, 2020 to file any dispositive motions.
- Opposition thereto shall be filed by May 15, 2020.
- Any replies shall be filed by April 29, 2020.

This is the first request to modify the briefing schedule for dispositive motions. We thank the Court for its time and consideration.

Respectfully submitted

Jehnifer McDougall

cc: Counsel of Record (via ECF)